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Honorable Whitman L. Holt  
Chapter 11

Attorneys for Rabo AgriFinance LLC

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON (SPOKANE/YAKIMA)

IN RE:

CASE NO. 21-00141-WLH11

EASTERDAY RANCHES, INC.,

**NOTICE OF APPEARANCE OF  
COUNSEL AND REQUEST  
FOR NOTICE**

Debtor and Debtor in  
Possession.

Pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, David H. Leigh of the law firm of Ray Quinney & Nebeker P.C. hereby enters his appearance as counsel of record for Rabo AgriFinance LLC (“Rabo”), a party in interest in the above-captioned chapter 11 case (the “Bankruptcy Case”), requests that his name be included on the master mailing list in this case, and further requests that notices of all hearings or actions in this case and copies of all motions, documents, or other papers filed by any party in interest in this case—including the Debtor, any subsequently-appointed chapter 11 trustee, any Committee of Unsecured Creditors, and/or the U.S. Trustee—be sent to the following:

NOTICE OF APPEARANCE OF  
COUNSEL AND REQUEST FOR  
NOTICE

**RAY QUINNEY & NEBEKER P.C.**  
36 South State Street, Ste. 1400  
Salt Lake City, UT 84111  
Telephone: (801) 532-1500

1 David H. Leigh, Esq.  
2 **RAY QUINNEY & NEBEKER P.C.**  
3 36 South State Street, 14<sup>th</sup> Floor  
4 Salt Lake City, Utah 84145-0385  
5 Telephone: (801) 532-1500  
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8 **PLEASE TAKE FURTHER NOTICE** that the foregoing request for  
9 notice shall include notices by mail, telephone, facsimile, or any other means of  
10 electronic transmission, and the notices requested shall include, but are not limited  
11 to, all notices relating to the matters set forth in Fed. R. Bankr. P. 2002; matters  
12 relating to any hearing for conversion or dismissal under 11 U.S.C. § 1112; matters  
13 relating to adequate protection pursuant to 11 U.S.C. § 361; matters relating to the  
14 assumption or rejection of any executory contract or unexpired lease under  
15 11 U.S.C. § 365; matters relating to the use, sale, or lease of estate property  
16 pursuant to 11 U.S.C. § 363; and/or matters relating to the filing, contents,  
17 confirmation, and modification of any proposed disclosure statement and/or  
18 chapter 11 plan of reorganization.

19 **PLEASE TAKE FURTHER NOTICE** that this *Notice of Appearance of*  
20 *Counsel and Request for Notice* or any pleading, claim, proof of claim, or suit filed  
21 by Rabo is not intended nor shall be deemed to in any way to waive, where  
22 applicable, (i) Rabo's right (a) to have final orders in any core or noncore matters  
23 entered only after *de novo* review by a district court judge to the extent required by  
24 the United States Supreme Court's rulings of Stern v. Marshall, 131 S. Ct. 2594  
25 (2011) and Executive Benefits Ins. Agency v. Arkison (In re Bellingham Ins.  
26 Agency), 134 S. Ct. 2165 (2014), any subsequent case law, and/or as otherwise  
required by the U.S. Constitution; (b) to a trial by jury in any proceedings so triable

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1 herein or in any case, controversy, or proceeding related hereto; and (c) to have the  
2 reference withdraw by the United States District Court in any matter subject to  
3 mandatory or discretionary withdrawal; and/or (ii) any other right, claim, action,  
4 defense, setoff, or recoupment, all of which are hereby expressly reserved.

5 DATED this 5<sup>th</sup> day of February, 2021.

6  
7 RAY QUINNEY & NEBEKER P.C.

8  
9 /s/ David H. Leigh

10 David H. Leigh

11 Attorneys for Rabo AgriFinance LLC  
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 US Trustee USTP.REGION18.SP.ECF@usdoj.gov I hereby further

**RAY QUINNEY & NEBEKER P.C.**  
36 South State Street, Ste. 1400  
Salt Lake City, UT 84111  
Telephone: (801) 532-1500

1 I also certify that on the same date I served a true and correct copy of the  
2 foregoing upon the following in the manner indicated below:  
3

4 **By U.S. Mail**

5 U.S. TRUSTEE  
6 UNITED STATES TRUSTEE  
7 US COURT HOUSE  
8 920 W. RIVERSIDE AVE STE 593  
9 SPOKANE WA 99201

**By U.S. Mail and Email**

GARY W. DYER  
US TRUSTEE'S OFFICE  
920 W. RIVERSIDE AVE STE 593  
SPOKANE WA 99201  
[Gary.W.Dyer@usdoj.gov](mailto:Gary.W.Dyer@usdoj.gov)

8 **By U.S. Mail and Email**

9 THOMAS A. BUFORD  
10 BUSH KORNFELD LLP  
11 601 UNION STREET, SUITE 5000  
12 SEATTLE, WA 98101  
13 [tbuford@bskd.com](mailto:tbuford@bskd.com)

**By U.S. Mail**

EASTERDAY RANCHES, INC.  
5235 N. INDUSTRIAL WAY  
PASCO, WA 99301

14 /s/ Suzanne Williams  
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